



STATE OF UTAH
NATURAL RESOURCES
Wildlife Resources

Norman H. Bangerter, Governor
Dee C. Hansen, Executive Director
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October 18, 1988

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Dr. Dianne R. Nielson, Director
Utah Division of Oil, Gas & Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

UTAH OIL, GAS & MINING

Attention: Susan Linner

Dear Dianne:

The Division has evaluated a response (08-08-88) to a Mine and Reclamation Plan (MRP) review and an update (08-30-88) of Genwal Coal Company's five year permit renewal at the Crandall Canyon Mine. The following is offered for your consideration.

Pages 3-18 and 19 (3.3.9.1), Underground Development Waste - The underground storage of waste should be done in such manner that it will not be exposed to water. Experience with other coal mines has shown this to be a problem when the water ultimately surfaces and is laden with oil products, suspended sediments or undesirable dissolved solids.

Pages 4-5 to 4-7 (4.4.2), Land Use - The use of wildlife on the permit area is not limited to just big game animals. As many as 239 different species of vertebrate wildlife have potential to utilize the environs associated with the project.

Comments using the term "Big Game" should be changed to "wildlife".

Page 7-71 (7.2.4), Discharge of mine water into Crandall Creek must meet UPDES effluent criteria for a Class III b trout fishery.

Page 10-7 to 10-9 (10.6), Stream Buffer Zone - Turbidity as measured in Nephelometric Turbidity Units (NTU) must not be allowed to increase beyond 10% of background measurements. Appropriate sediment control (straw filters and instream sediment traps) can accomplish this need. A variance from the Bureau of Water Pollution Control would be protested by DWR due to impacts on natural reproduction of fish from sediment pollution.

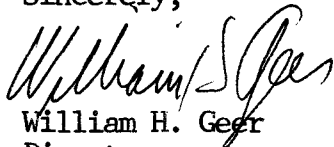
Chapter 10 (Item 10-3), Page 46 of "terrestrial Wildlife and Habitat Report" - The Williamson's sapsucker, a species having high federal interest, has been documented to utilize (nest) the environs of the Huntington drainage typical to those found in Crandall Canyon. The applicant must appropriately correct the MRP.

Dr. Dianne R. Nielson
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Pages 12-9 to 12-12 (12.4.3), Subsidence - The Applicant must evaluate
the potential impact of subsidence on raptors. 12-9 through 12-12
are missing from the applicant's MRP submission.

Thank you for an opportunity to review and provide comment.

Sincerely,


William H. Geer
Director

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